

December 13, 1996

Ms. Irene M. Johnson, Acting Manager
Nuclear Regulatory Services
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (TAC NOS. M94830 AND M94831)

Dear Ms. Johnson:

On February 23, 1996, Commonwealth Edison Company (ComEd) submitted its second ten-year Inservice Inspection Program and associated relief requests for the Byron Station, Units 1 and 2. In its submittal, ComEd requested expedited review for Relief Requests 12R-11 and 12R-12. Relief Request 12R-11 was subsequently withdrawn by ComEd on June 12, 1996; we authorized Relief Request 12R-12 on July 22, 1996.

Requests for Additional Information (RAI) regarding the remaining relief requests were issued on June 13, 1996, and October 16, 1996. ComEd provided its response to the first RAI on August 12, 1996. During the continuation of our review, we have identified the need for further information as discussed in the enclosed RAI. Please provide your response to the questions within 60 days of receipt of this request so that we may maintain our schedule for review of your submittal.

In addition, in order to expedite the review process, please send a copy of the RAI response to our contractor, Idaho National Engineering Laboratory (INEL), at the following address:

Mr. Michael T. Anderson
INEL Research Center
2151 North Boulevard
P.O. Box 1625
Idaho Falls, Idaho 83415-2209

Sincerely,

Original signed by:

George F. Dick, Jr., Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

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PDR ADOCK 05000454
P PDR

Docket Nos. STN 50-454, STN 50-455

Enclosure: RAI

cc w/encl: see next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

December 13, 1996

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Commonwealth Edison Company
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2151 North Boulevard
P.O. Box 1625
Idaho Falls, Idaho 83415-2209

Sincerely,

A handwritten signature in cursive script, reading "George F. Dick, Jr.", is written over the typed name.

George F. Dick, Jr., Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-454, STN 50-455

Enclosure: RAI

cc w/encl: see next page

I. Johnson
Commonwealth Edison Company

cc:

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Kenneth Graesser, Site Vice President
Byron Station
Commonwealth Edison Station
4450 N. German Church Road
Byron, Illinois 61010

REQUEST FOR ADDITIONAL INFORMATION
SECOND TEN-YEAR INSERVICE INSPECTION INTERVAL
COMMONWEALTH EDISON COMPANY
BYRON STATION, UNITS 1 AND 2
DOCKET NOS. STN 50-454 AND STN 50-455

1. Background

The *Code of Federal Regulations* provide that a licensee may propose an alternative to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) requirements in accordance with 10 CFR 50.55a(a)(3)(i) or 10 CFR 50.55a(a)(3)(ii). Pursuant to 10 CFR 50.55a(a)(3)(i), the proposed alternative must be shown to provide an acceptable level of quality and safety; i.e., essentially, be equivalent to the original requirement in terms of quality and safety. Pursuant to 10 CFR 50.55a(a)(3)(ii), the licensee must show that compliance with the original requirement results in a hardship or unusual difficulty without a compensating increase in the level of quality and safety. Examples of hardship and/or unusual difficulty include, but are not limited to, excessive radiation exposure, disassembly of components solely to provide access for examinations, and development of sophisticated tooling that would result in only minimal increases in examination coverage.

A request for relief from ASME requirements in accordance with 10 CFR 50.55a(g)(5)(iii), may also be submitted if a licensee determines that conformance with certain Code requirements is impractical for its facility. The licensee shall notify the Commission and submit, as specified in §50.4, information to support that determination. When a licensee determines that an inservice inspection requirement is impractical, e.g., the system would have to be redesigned, or a component would have to be replaced to enable inspection, the licensee should cite 10 CFR 50.55a(g)(5)(iii). The NRC may, giving due consideration to the burden placed on the licensee, impose an alternative examination requirement.

2. Staff Requests

The staff has reviewed the licensee's submittals of February 23, 1996, and August 12, 1996, and concluded that the following specific information and/or clarification is required to complete the review of the ISI Program Plan:

ENCLOSURE

- A. Relief Requests I2R-01* and I2R-02 were submitted pursuant to 10 CFR 50.55a(a)(3)(ii). However, the bases for these requests mention "physical obstructions and geometric limitations" and "examinations performed to the extent practical." Similarly, Relief Request I2R-05 was submitted pursuant to 10 CFR 50.55a(a)(3)(i), but the alternative is to perform the Code-required examinations to the "maximum extent practical." It is unclear as to which paragraph of 10 CFR 50.55a these requests should be evaluated against. Provide appropriate references to the *Code of Federal Regulations* and clarify the supporting bases for the subject requests.
- B. Relief Request I2R-17 was submitted without reference to a section of the *Code of Federal Regulations*. Without this reference, the request can not be evaluated. Provide the appropriate reference to the *Code of Federal Regulations*.

*Evaluation of Relief Request I2R-01 to ASME Section XI requirements is pending review of the licensee's response to the October 16, 1996, RAI regarding the augmented RPV examination required by 10 CFR 50.55a(g)(6)(ii)(A).